

**Beth McCullough**

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**From:** Ben Gastel  
**Sent:** Monday, March 03, 2014 2:17 PM  
**To:** 'Kristen Johnson Parker'; 'Louis R. Moffa'; 'Stephen A. Grossman'; 'Eric Hoffman'; 'Brett J. Bean'; 'Brian Gerling'; 'Christopher Hassell'; 'Chris J. Tardio'; 'C. J. Gideon, Jr.'; 'Cynthia Palin'; 'Christopher M. Wolk'; 'David Thomas'; 'Jay J. Blumberg'; 'Joseph R. Lang'; 'John M. Lovely'; 'John-Mark Zini'; 'Jack Reinholtz'; 'Kristin Mykulak'; 'Kristen R. Ragosta'; 'Kenneth B. Walton'; 'Marcy Greer'; 'Matthew H. Cline'; 'Michael Hayes'; 'C. Mark Hoover'; 'Michael Gardner'; 'Michael Pikiel'; 'Louis Moffa'; 'Michael Sams'; 'Mary-Rose Watson'; 'Nancy Reynolds'; 'Nicole Dorman'; 'Roberto Bracerias'; 'Steven Drake'; 'Randy J. Hackney'; 'Rhond L. Beesing'; 'Paul Saltzman'; 'Sean E. Capplis'; 'Daniel Ari Shapiro'; 'Tory Weigand'; 'Yvonne Puig'; 'mgreer@adjtlaw.com'; Jay Blumberg (jjblumberg@blumberglawoffices.com); 'Puig, Yvonne K.'; 'Sarah Kelly (SKelly@nutter.com)'; 'lhollabaugh@babco.com' (lhollabaugh@babco.com); 'Hoffman, Eric'; 'mgreer@adjtlaw.com'; Jay Blumberg (jjblumberg@blumberglawoffices.com); 'jlauner@goodwinprocter.com'; 'phermes@hermesnetburn.com'; 'jmcampbell@campbell-trial-lawyers.com'; 'drogers@campbell-trial-lawyers.com'; 'rboston@campbell-trial-lawyers.com'; 'dricardo@hermesnetburn.com'  
**Cc:** 'Thomas Sobol'; 'Kimberly A. Dougherty'; 'Mike Barker'; 'Patrick T. Fennell'; Gerard Stranch; 'Marc Lipton'; 'Chalos, Mark P. (mchalos@lchb.com)'; 'mark@markzamora.com'; 'rellis@ellisrapacki.com'; Kristen Johnson Parker (kristenjp@hbsslaw.com); Edward Notargiacomo (EdwardNotargiacomo@hbsslaw.com)  
**Subject:** Deposition Protocol  
**Attachments:** 03-03-14 Deposition Protocol\_Revised from Meet and Confers (00315402).DOC

All,

Following up on the below email, I attach a current redlined version of the deposition protocol. This is redlined against the PSC's deposition protocol previously filed with the Court. This week, the PSC will hold another meet and confer on this deposition protocol and the ESI protocol I circulated last week. If any other defendant wants to participate in this ongoing meet and confer process, please let me know.

Thank you,

Ben Gastel  
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**From:** Ben Gastel  
**Sent:** Friday, February 28, 2014 11:43 AM  
**To:** Kristen Johnson Parker; Louis R. Moffa; Stephen A. Grossman; Eric Hoffman; Brett J. Bean; Brian Gerling; Christopher Hassell; Chris J. Tardio; C. J. Gideon, Jr.; Cynthia Palin; Christopher M. Wolk; David Thomas; Jay J. Blumberg; Joseph R. Lang; John M. Lovely; John-Mark Zini; Jack Reinholtz; Kristin Mykulak; Kristen R. Ragosta; Kenneth B. Walton; Marcy Greer; Matthew H. Cline; Michael Hayes; C. Mark Hoover; Michael Gardner; Michael Pikiel; Louis Moffa; Michael Sams;

Exhibit G

Mary-Rose Watson; Nancy Reynolds; Nicole Dorman; Roberto Bracerias; Steven Drake; Randy J. Hackney; Rhond L. Beesing; Paul Saltzman; Sean E. Capplis; Daniel Ari Shapiro; Tory Weigand; Yvonne Puig; 'mgreer@adjtlaw.com'; Jay Blumberg ([jjblumberg@blumberglawoffices.com](mailto:jjblumberg@blumberglawoffices.com)); Puig, Yvonne K.; Sarah Kelly ([SKelly@nutter.com](mailto:SKelly@nutter.com)); 'lhollabaugh@babco.com' ([lhollabaugh@babco.com](mailto:lhollabaugh@babco.com)); Hoffman, Eric; 'mgreer@adjtlaw.com'; Jay Blumberg ([jjblumberg@blumberglawoffices.com](mailto:jjblumberg@blumberglawoffices.com)); 'jlauner@goodwinprocter.com'; [phermes@hermesnetburn.com](mailto:phermes@hermesnetburn.com); [jmcampbell@campbell-trial-lawyers.com](mailto:jmcampbell@campbell-trial-lawyers.com); [drogers@campbell-trial-lawyers.com](mailto:drogers@campbell-trial-lawyers.com); [rboston@campbell-trial-lawyers.com](mailto:rboston@campbell-trial-lawyers.com); [dricardo@hermesnetburn.com](mailto:dricardo@hermesnetburn.com)

**Cc:** Thomas Sobol; Kimberly A. Dougherty; Mike Barker; Patrick T. Fennell; Gerard Stranch; Marc Lipton; Chalos, Mark P. ([mchalos@lchb.com](mailto:mchalos@lchb.com)); [mark@markzamora.com](mailto:mark@markzamora.com); 'rellis@ellisrapacki.com'; Kristen Johnson Parker ([kristenjp@hbsslaw.com](mailto:kristenjp@hbsslaw.com)); Edward Notargiacomo ([EdwardNotargiacomo@hbsslaw.com](mailto:EdwardNotargiacomo@hbsslaw.com))

**Subject:** ESI Protocol

All,

The PSC has had several meet and confers recently with some defendants on the PSC's proposed deposition and ESI protocols. Attached is the current version of the ESI Protocol. Should any additional defendant wish to participate in this ongoing meet and confer process, please let me know.

Thank you,

Ben Gastel

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